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United States Bankruptcy Court
Eastern District of Pennsylvania

James Momoh Kemokai,

Debtor.

Chapter 13

Case No. 24-10277-AMC

Amended Motion to Modify Plan

AND NOW, Debtor James Momoh Kemokai, by and through his attorney, moves this Court to modify his confirmed Chapter 13 plan. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under Chapter 13 on January 30, 2024.
2. The plan was confirmed on October 2, 2024.
3. The current plan provides for pro-rata distributions to unsecured creditors.
4. The Debtor now wishes to sell his home.
5. The proposed plan modifies the funding of the plan to pay 100% to unsecured creditors, excepting student loans.
6. The proposed plan also provides that moving forward, the Debtor will continue to make his monthly payments of \$1,162 to the Trustee, until such time that this Court approves the Debtor's home to be sold free and clear of liens, at which point a portion of the sale proceeds will be paid to the Trustee to cover the remaining balance needed to pay all unsecured creditors at 100%.
7. The Debtor asks this Court to approve the modified plan.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: August 20, 2025

CIBIK LAW, P.C.
Counsel for Debtor

/s/ Michael A. Cibik
Michael A. Cibik (#23110)
Cibik Law, P.C.
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com